

Exhibit A

Under Seal

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JANE STREET GROUP, LLC,

Plaintiff,

v.

MILLENIUM MANAGEMENT LLC,
DOUGLAS SCHADEWALD, and DANIEL
SPOTTISWOOD,

Defendants.

Case No. 24-CV-02783

Judge Engelmayer

Exhibit A to Defendants'

April 18, 2024 Letter

Filed Under Seal

DEFENDANTS'
EXPEDITED DISCOVERY REQUESTS

Requests For Production

The Documents and Communications requested are to be produced in industry-standard electronic formats per a discovery protocol to be agreed by the parties. Unless otherwise stated herein, all words and phrases used herein shall be accorded their usual meaning and shall be interpreted in their common-sense and ordinary meaning.

Request No. 1. Documents and communications sufficient to show Plaintiff's alleged trade secrets at issue in this litigation, including each of the code name strategies listed at paragraph 52 of the Complaint [REDACTED] ("Hyssop") and the strategies identified in paragraphs 12-14 of the Nanney Declaration, as well as any confidential or proprietary information allegedly misappropriated by Defendants.

Request No. 2. All documents and communications regarding Plaintiff's allegations that Defendants misappropriated trade secrets or confidential or proprietary information, including any analysis or discussions regarding Defendants' trading of India options at Millennium.

Request No. 3. All documents and communications relating to Messrs. Schadewald's and Spottiswood's employment with and departure from Plaintiff, including contracts, performance reviews, and reactions and steps to address their respective departures.

Request No. 4. Records, including all trade descriptions, recaps or writeups, of all transactions and all orders [REDACTED] in the India market (including [REDACTED] options) made by Jane Street between January 1, 2023 through present.

Request No. 5. Plaintiff's as well as [REDACTED] investors) profit and loss statements, [REDACTED] relating to all such trading activities, including on a daily and 5-minute basis from January 1, 2023 through present.

Request No. 6. All documents and communications concerning Plaintiff's trading strategy in the India options market on [REDACTED] including the recap from that day and the graphs generated relating to that trading.

Request No. 7. All documents and communications concerning Plaintiff's allegations of margin limitations in paragraphs 153-156 of the Complaint, as well as historical margin-related or exchange-limit related limitations experienced by Plaintiff in connection with India option trading.

Request No. 8. All documents and communications regarding Plaintiff's allegations that it has taken reasonable steps to maintain the confidentiality of purported trade secrets and proprietary and confidential information, including documents regarding the use of the following list serves to [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

Request No. 9. All documents and communications regarding Plaintiff's analysis or identification of [REDACTED]

[REDACTED]

[REDACTED]

Request No. 10. All documents and communications regarding the [REDACTED]
[REDACTED] relating to India options trading.

Interrogatories

Interrogatory No. 1. Identify each alleged trade secret Plaintiff claims Defendants misappropriated, as well as the Bates Numbers for any documents setting forth such alleged trade secret.

Interrogatory No. 2. Identify each item of proprietary or confidential information Plaintiff claims Defendants misappropriated, as well as the Bates Numbers for any documents setting for such alleged proprietary or confidential information.

Interrogatory No. 3. Identify each instance in which any Defendant allegedly misappropriated, used, or disclosed Plaintiff's alleged trade secrets or proprietary or confidential information, including the Bates Numbers for any documents relating to any such alleged misappropriation or use.

Interrogatory No. 4. Identify each specific set of trades by date, time, product, structure and direction that Plaintiff alleges was mirrored by Defendants, and your basis for making that assertion and any supporting documentation by Bates Number.

Deposition Requests

Defendants seek to depose the following individuals, during normal business hours in New York, prior to the hearing on a preliminary injunction: (i) Sandor Lehoczky; (ii) Jeff Nanney; (iii) Andrew Westerdale; (iv) [REDACTED] and (vi) Rob Granieri.

In addition, Defendants seek a Fed. R. Civ. P. 30(b)(6) deposition of Plaintiff on topics to be served no later than the conclusion of written and document discovery.

Third Party Subpoena

Defendants seek to serve one third party subpoena for documents on The Omerta Group, which will include the following document request: “All documents and communications regarding the recruitment of personnel to serve as Indian options traders on behalf of Jane Street Group, LLC.”